



William K. Wolf
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Application granted. The Stipulation shall be "So Ordered" and docketed separately.

The Clerk of the Court is respectfully directed to terminate the pending motion sequence at Doc. 31.

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VIA ECF SO ORDERED.

The Hon. Daniel Pa
500 Pearl
New York

Philip M. Halpern
United States District Judge

Dated: New York, New York
December 8, 2020

Re: Winston, et al. v. Pine Valley Center for Rehabilitation and Nursing
Case No. 20-cv-04006 (PMH, PED)
Pine Valley Center, LLC v. Local 670 RWDSU, AFL-CIO
Case No. 20-cv-06645 (PMH, PED)

Dear Judge Halpern:

We are counsel to Plaintiffs Thelma Winston, et al., as Trustees and Fiduciaries ("Plaintiffs" or the "Trustees") of the Local 670 Welfare Fund and the Local 670 Pension Fund (the "Funds"), Plaintiffs in the above-referenced action. We are also counsel to Local 670 RWDSU, AFL-CIO ("Local 670" or the "Union"), Defendant in the second above-referenced action.¹

We request, on consent, that the Court extend the Union's time to answer or otherwise respond from December 8, 2020 to December 18, 2020 by So Ordering the attached Stipulation Extending Defendant's Time to Answer or Otherwise Respond. We make this request because one of my law partners contracted COVID-19, our office is shut down for the moment, and, at this time we have only limited access to our files. Further, our clients are speaking directly about a resolution.

¹ By Order dated October 1, 2020, the Court consolidated these two cases into one action.

Rothman Rocco LaRuffa LLP

December 7, 2020

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Please do not hesitate to contact me or Dawn J. Lanouette, Esq., counsel to Pine Valley Center, LLC, if you require additional information. Thank you for your consideration.

Respectfully submitted,

William K. Wolf

Encl.

cc: The Hon. Paul A. Davison, U.S.M.J. (via email)
Dawn J. Lanouette, Esq., (w/encl.)(via ECF and email)